

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 08-22 J
vs.	:	
	:	
BRADLEY T. KAHLE,	:	
	:	Electronically Filed
Defendant	:	

**MOTION FOR PRETRIAL RELEASE**

AND NOW, comes the Defendant, Bradley T. Kahle, by and through his court appointed counsel, Arthur T. McQuillan, Esquire, and respectfully submits this Motion For Pretrial Release. In support thereof, counsel states:

1. That a detention hearing was held before Keith A. Pesto, Magistrate Judge, on June 11, 2008, and Mr. Kahle was released pending Indictment;
2. That on June 23, 2008, the Government, through Assistant United States Attorney Margaret E. Picking, moved this Court for revocation of Defendant's pretrial release due to violation of the conditions of release;
3. That on June 23, 2008, Keith A. Pesto, United States District Judge, revoked Mr. Kahle's conditions of release and directed he be detained in the Cambria County jail pending trial in this matter;

4. That Mr. Kahle was arraigned on July 15, 2008, with respect to an Indictment charging him with violating 261 U.S.C. Section 5845(a);

5. That Mr. Kahle has been continuously incarcerated in the Cambria County prison since June 23, 2008;

6. That the Defendant has made arrangements to reside at Peace's Personal Care Home, 429 Union Street, P. O. Box 536, Big Run, Pennsylvania 15715, pending Court approval; and

7. That if said Motion is granted, Defendant will abide by all terms and conditions of pretrial release set by this Honorable Court.

WHEREFORE, this Honorable Court is requested to set a date and time for hearing in regarding to Defendant's Motion For Pretrial Release.

Respectfully submitted,

GLEASON, McQUILLAN,  
BARBIN & MARKOVITZ, LLP

s/Arthur T. McQuillan  
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